

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MASSIMO LA ROSA)	CASE NO. 1:18-cv-00095
)	
Plaintiff)	JUDGE DONALD C. NUGENT
)	
-vs-)	
)	<u>DEFENDANT JONATHAN ALLEN'S</u>
JONATHAN ALLEN, et al.)	<u>UNOPPOSED MOTION FOR</u>
)	<u>EXTENSION OF TIME TO RESPOND</u>
Defendants)	<u>TO PLAINTIFF'S COMPLAINT</u>
)	

Defendant Jonathan Allen respectfully moves this Court for a 14-day extension of time, up to and including February 2, 2018, in which to answer or otherwise respond to Plaintiff Massino La Rosa's Complaint.

Defendant Abbie Conant removed this case to this Court on January 12, 2018. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), Mr. Allen must answer or otherwise respond to the Complaint by January 19, 2018. Mr. Allen respectfully requests additional time to investigate and respond to the pleading. No prior extensions have been requested or granted, and this request is not made for the purposes of delay.

Plaintiff's counsel has agreed to Mr. Allen's request for additional time to respond to the Complaint.

For the foregoing reasons, Mr. Allen respectfully requests an extension of time, up to and including February 2, 2018, to answer or otherwise respond to Plaintiff's Complaint. A proposed Order is attached for the Court's convenience.

Respectfully submitted,

/s/ Carol K. Metz

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JUSTIN W. WHELAN (0088085)

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of January, 2018 a copy of the foregoing *Unopposed Motion for Extension of Time to Respond to Plaintiff's Complaint* was filed electronically, notice of which will be sent to all parties by operation of the Court's electronic filing system.

/s/ Carol K. Metz

CAROL K. METZ

Bar No. (0072833)